SOUTHERN DISTRICT OF NEW YORK		
	X :	
WI-LAN INC.,	:	10 Civ. 432 (LAK) (AJP)
Plaintiff,	:	
v.	:	
LG ELECTRONICS, INC. and LG	:	
ELECTRONICS U.S.A., INC.,	: :	
Defendants.	:	
	X	

AFFIRMATION OF JAMES J. LUKAS, JR. IN SUPPORT OF DEFENDANTS' MOTION FOR LEAVE TO AMEND THEIR PLEADINGS PURSUANT TO FED. R. CIV. P. 15(a)

I, James J. Lukas, Jr., affirm as follows:

UNITED STATES DISTRICT COURT

- 1. I am an attorney at Greenberg Traurig, LLP, attorneys for Defendants and Counterclaim-Plaintiffs LG Electronics, Inc. and LG Electronics U.S.A., Inc. (collectively "LG" or "Defendants") in the above-captioned matter. I have personal knowledge of the facts discussed herein and, if called to testify, I would and could competently testify to those facts. I respectfully submit this Affirmation in support of Defendants' Motion for Leave to Amend Their Pleadings.
- 2. Attached hereto as **Exhibit 1** is a true and correct copy of the proposed LG Electronics, Inc.'s First Amended Answer and Counterclaims to Plaintiff's Second Amended Complaint.
- 3. Attached hereto as **Exhibit 2** is a true and correct copy of the proposed LG Electronics U.S.A., Inc.'s First Amended Answer and Counterclaims to Plaintiff's Second Amended Complaint.

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I declare under penalty of perjury under the laws of the United States that the foregoing information is true and correct to the best of my knowledge, information and belief.

Dated: December 6, 2010 /s/ James J. Lukas, Jr.

James J. Lukas, Jr.